

# Exhibit 1

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**From:** Luke Roniger  
**Sent:** Monday, August 29, 2022 6:00 PM  
**To:** Igor Litvak  
**Cc:** Laura Harris; Andrew Michaelson; Sumon Dantiki; Matthew Bush; Paul Weeks  
**Subject:** RE: Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

Igor, we will agree to an extension as proposed below. Please provide your responses ten days from Friday, August 26<sup>th</sup>.

Luke

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**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Sent:** Friday, August 26, 2022 12:18 PM  
**To:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
**Subject:** Re: Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

**CAUTION: MAIL FROM OUTSIDE THE FIRM**

Luke,  
I discussed with the defendants, they will respond to your discovery demands, please give us 10 days to respond, it's the end of August and everyone is on vacation, thank you.  
Sincerely,

Igor Litvak, Esq.  
The Litvak Law Firm, PLLC  
1733 Sheepshead Bay Road, Suite 22  
Brooklyn, NY 11235  
Tel/Fax: 718-989-2908  
Email: [Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)  
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**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Sent:** Thursday, August 25, 2022 8:54 PM  
**To:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
**Subject:** Re: Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

Here is the order, she vacated the scheduling order, stayed all discovery of the Plaintiff, and as for the Defendants, ordered them to serve only Initial Disclosures by June 17th, she did not authorize any other

discovery demands to be served on the Defendants. I am not sure what happened to your email, I really never got it, otherwise I would have told you the same regarding my understanding of that order. I will email your discovery demands to my clients, and will do my best discuss the same with them tomorrow.

Igor Litvak, Esq.  
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**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Sent:** Thursday, August 25, 2022 7:20 PM  
**To:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
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Yes, I didn't receive the email and I didn't know about these requests until today, you could have at least sent a follow up email or ask for receipt confirmation. But more importantly the last I remember was that she suspended the discovery schedule we agreed on and then ordered defendants to serve initial disclosures by June 17., there was nothing else. Where are you getting from that google can serve discovery demands. I am happy to get on the phone tomorrow to discuss the same.

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**From:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Sent:** Thursday, August 25, 2022 7:13:52 PM  
**To:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
**Subject:** RE: Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

Igor,  
First, in your email below, you claim that you did not receive an email from us on July 19 attaching discovery requests. I am herewith re-attaching to you the email that we sent you on July 19. Is it your position that you did not receive this email on July 19? Is it your position that you did not know about these requests until today?  
Second, you suggest that the Judge froze all discovery except for Defendants' initial disclosures. Can you please confirm that is your position?  
To be clear, our position is that discovery of Defendants is not frozen, and that your responses are past due. We ask that you provide responses to our requests by Sunday, and that we set a time for a meet-and-confer on Monday to discuss the responses (or lack thereof). Please let us know what would work for you.

Luke

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**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Sent:** Thursday, August 25, 2022 12:05 PM  
**To:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
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On July 19th I only got two emails, and none of them were from you. Also, why are you serving discovery demands, didn't the Judge freeze everything except Defendant's initial disclosures?

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**To:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
**Subject:** RE: Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

Igor, on July 19, we served interrogatories and requests for production of documents and inspection of devices pursuant to the attached email.

Luke

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**From:** Igor Litvak <[Igor@LitvakLawNY.com](mailto:Igor@LitvakLawNY.com)>  
**Sent:** Thursday, August 25, 2022 10:38 AM  
**To:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>  
**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>  
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Which discovery requests, do you mean the questions you posed to defendants and me????

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**From:** Luke Roniger <[LRoniger@KSLAW.com](mailto:LRoniger@KSLAW.com)>

**Sent:** Thursday, August 25, 2022 11:24:29 AM

**To:** Igor Litvak <[igor@LitvakLawNY.com](mailto:igor@LitvakLawNY.com)>

**Cc:** Laura Harris <[lharris@kslaw.com](mailto:lharris@kslaw.com)>; Andrew Michaelson <[amichaelson@kslaw.com](mailto:amichaelson@kslaw.com)>; Matthew Bush <[mbush@kslaw.com](mailto:mbush@kslaw.com)>; Sumon Dantiki <[sdantiki@kslaw.com](mailto:sdantiki@kslaw.com)>; Paul Weeks <[PWeeks@KSLAW.com](mailto:PWeeks@KSLAW.com)>

**Subject:** Discovery Requests - Google Inc. v. Starovikov et al. - 21-cv-10260

Igor,

Responses to our discovery requests were due one week ago. Do you intend to provide any discovery pursuant to those requests? We would like to meet-and-confer on this issue as we intend to move to compel that discovery.

Thanks,  
Luke

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